

# EXHIBIT A

FILED: ORANGE COUNTY CLERK 03/29/2022 05:41 PM

NYSCEF DOC. NO. 1

INDEX NO. EF001842-2022

RECEIVED NYSCEF: 03/29/2022

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

RANDI STASSA,

Plaintiff,

-against-

PYRAMID MANAGEMENT GROUP, LLC,  
CRSYTAL RUN NEWCO, LLC, and  
TARGET CORPORATION,

Defendants.

VERIFIED  
COMPLAINT

Index No.:

Plaintiff, RANDI STASSA, by her attorneys, SOBO & SOBO, L.L.P., as and for  
the Verified Complaint, herein alleges the following:

1. That at all times hereinafter mentioned, the Plaintiff was and still is a  
resident of the County of Orange, State of New York.

2. That at all times hereinafter mentioned, upon information and belief, the  
Defendant, PYRAMID MANAGEMENT GROUP, LLC, was and still is a domestic  
limited liability company organized and existing under and by virtue of the Laws of the  
State of New York.

3. That at all times hereinafter mentioned, upon information and belief, the  
Defendant, PYRAMID MANAGEMENT GROUP, LLC, was and still is a domestic  
limited liability company duly authorized to do business within the State of New York.

4. That at all times hereinafter mentioned, upon information and belief, the  
Defendant, PYRAMID MANAGEMENT GROUP, LLC, was and still is a business entity  
doing business within the State of New York.

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5. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, was and still is a foreign limited liability company organized and existing under and by virtue of the Laws of the State of Delaware.

6. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, was and still is a foreign limited liability company duly authorized to do business within the State of New York.

7. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, was and still is a business entity doing business within the State of New York.

8. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, was and still is a foreign corporation organized and existing under and by virtue of the Laws of the State of Minnesota.

9. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, was and still is a foreign corporation duly authorized to do business within the State of New York.

10. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, was and still is a business entity doing business within the State of New York.

11. That at all times hereinafter mentioned, upon information and belief, the Defendant, PYRAMID MANAGEMENT GROUP, LLC, was the owner of a certain premises located at 1 North Galleria Drive, Middletown, County of Orange, State of New York, commonly known as "Target."

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12. That at all times hereinafter mentioned, upon information and belief, the Defendant, PYRAMID MANAGEMENT GROUP, LLC, maintained the aforesaid premises.

13. That at all times hereinafter mentioned, upon information and belief, the Defendant, PYRAMID MANAGEMENT GROUP, LLC, managed the aforesaid premises.

14. That at all times hereinafter mentioned, upon information and belief, the Defendant, PYRAMID MANAGEMENT GROUP, LLC, controlled the aforesaid premises.

15. That at all times hereinafter mentioned, upon information and belief, the Defendant, PYRAMID MANAGEMENT GROUP, LLC, operated the aforesaid premises.

16. That at all times hereinafter mentioned, upon information and belief, the Defendant, PYRAMID MANAGEMENT GROUP, LLC, was the lessee of the aforesaid premises.

17. That at all times hereinafter mentioned, upon information and belief, the Defendant, PYRAMID MANAGEMENT GROUP, LLC, was the lessor of the aforesaid premises.

18. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, was the owner of a certain premises located at 1 North Galleria Drive, Middletown, County of Orange, State of New York, commonly known as "Target."

19. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, maintained the aforesaid premises.

20. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, managed the aforesaid premises.



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21. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, controlled the aforesaid premises.

22. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, operated the aforesaid premises.

23. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, was the lessee of the aforesaid premises.

24. That at all times hereinafter mentioned, upon information and belief, the Defendant, CRSYTAL RUN NEWCO, LLC, was the lessor of the aforesaid premises.

25. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, was the owner of a certain premises located at 1 North Galleria Drive, Middletown, County of Orange, State of New York, commonly known as "Target."

26. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, maintained the aforesaid premises.

27. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, managed the aforesaid premises.

28. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, controlled the aforesaid premises.

29. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, operated the aforesaid premises.

30. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, was the lessee of the aforesaid premises.

31. That at all times hereinafter mentioned, upon information and belief, the Defendant, TARGET CORPORATION, was the lessor of the aforesaid premises.

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32. That at all times hereinafter mentioned, the aforesaid premises was the situs of the accident.

33. That on the 18<sup>th</sup> day of June 2019, while this Plaintiff was lawfully upon the aforesaid premises, she was caused to be precipitated to the ground, thereby sustaining severe and serious personal injuries.

34. The negligent, wanton, reckless and careless acts of the Defendants, their agents, servants and/or employees were the cause of the accident and resultant injuries.

35. That the Defendants, their agents, servants and/or employees were negligent, wanton, reckless and careless in, among other things, allowing, causing and/or permitting dangerous, hazardous, slippery and/or unsafe conditions to exist on the aforesaid premises; in acting with reckless disregard for the safety of others; in creating a trap like condition; in negligent hiring, training, retaining, and supervising employees; and the Defendants, their agents, servants and/or employees were in other ways negligent, wanton, reckless and careless.

36. That the Defendants, their agents, servants and/or employees had actual and/or constructive notice of the dangerous and/or defective conditions in that the conditions existed for a sufficient length of time prior to the happening of the incident and in the exercise of reasonable care, the Defendants could have and should have had knowledge and notice thereof and further, the Defendants, their agents, servants and/or employees created said condition.

37. The limited liability provisions of CPLR 1601 do not apply pursuant to the exceptions of CPLR 1602, including, but not limited to, 1602(2)(iv), 1602(7) and 1602(11).

38. That by reason of the foregoing, this Plaintiff was caused to sustain severe and serious personal injuries to her mind and body, some of which, upon information and

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belief, are permanent with permanent effects of pain, disability, disfigurement and loss of body function. Further, this Plaintiff was caused to expend and become obligated for diverse sums of money for the purpose of obtaining medical care and/or cure in an effort to alleviate the suffering and ills sustained as a result of this accident; the Plaintiff further was caused to lose substantial periods of time from her normal vocation and activities, and upon information and belief, may continue in that way into the future and suffer similar losses.

39. That by reason of the foregoing, the Plaintiff has been damaged in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction of this matter.

**WHEREFORE**, Plaintiff demands judgment against the Defendants, and each of them, as follows:

A sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction in this matter, together with the costs and disbursements of this action.

Dated: March 3, 2022  
Middletown, New York



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Lee Mandarin, Esq.  
SOBO & SOBO, LLP  
Attorneys for Plaintiff  
One Dolson Avenue  
Middletown, NY 10940  
(845) 343-7626

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TO:

PYRAMID MANAGEMENT GROUP, LLC  
c/o New York Secretary of State  
Albany, New York

CRSYTAL RUN NEWCO, LLC  
c/o New York Secretary of State  
Albany, New York

TARGET CORPORATION  
Personally  
1 North Galleria Drive  
Middletown, New York 10941



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VERIFICATION


STATE OF NEW YORK )  
 ) ss:  
COUNTY OF ORANGE )

RANDI STASSA, being duly sworn says; I am the Plaintiff in the action herein; I have read the annexed Verified Complaint, know the contents thereof and the same are true to my knowledge, except those matters therein which are stated to be alleged on information and belief, and as to those matters, I believe them to be true.

  
RANDI STASSA

Sworn to before me on this

March 3, 2022

  
NOTARY PUBLIC

JASMINE BURNETT  
Notary Public, State of New York  
Registration #01BU6372837  
Qualified In Orange County  
Commission Expires March 26, 2022

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

-----X  
RANDI STASSA,

Plaintiff,

-against-

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PYRAMID MANAGEMENT GROUP, LLC,  
CRSYTAL RUN NEWCO, LLC, and  
TARGET CORPORATION,

Defendants.  
-----X

**NOTICE OF ELECTRONIC FILING**

**You have received this Notice because:**

- The Plaintiff, whose name is listed above, has filed this case using the New York State Courts e-filing system, and
- You are a Defendant (a party) in this case.  
(CPLR § 2111, Uniform Rule § 202.5-bb)

**If you are represented by an attorney:** give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

**If you are not represented by an attorney:** you are not required to e-file. You may serve and file documents in paper form and you must be served with documents in paper form. However, as a party without an attorney, you may participate in e-filing.

**Benefits of E-Filing**

You can:

- serve and file your documents electronically
- view your case file on-line
- limit your number of trips to the courthouse
- pay any court fees on-line.

There are no additional fees to e-file, view, or print your case records.

To sign up for e-filing or for more information about how e-filing works, you may:

- visit: [www.nycourts.gov/efile-unrepresented](http://www.nycourts.gov/efile-unrepresented) or
- go to the Help Center or Clerk's Office at the court where the case was filed. To find legal information to help you represent yourself visit [www.nycourthelp.gov](http://www.nycourthelp.gov)

**Information for Attorneys**

An attorney representing a party who is served with this notice must either:

- 1) immediately record his or her representation with the e-filed matter on the NYSCEF site <https://iapps.courts.state.ny.us/nyscef/HomePage>; or
- 2) file the Notice of Opt-Out form with the clerk of the court where this action is pending. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the operational knowledge to comply with e-filing requirements. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: [efile@nycourts.gov](mailto:efile@nycourts.gov)).

Dated: March 30, 2022  
Middletown, New York

Lee Mandarinino, Esq.  
Name

ONE DOLSON AVENUE  
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Firm Name

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Albany, New York

CRSYTAL RUN NEWCO, LLC  
c/o New York Secretary of State  
Albany, New York

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